

 <p>Policy and Procedure</p>	Subject / Title	Policy No.: 850-122-26
	Contractor/Sub-Contractor Safety & Environmental Practices at HMC	Origination Date: 12/06
		Last Revision Date:
		Last Review Date: 6/07 By: <u>Tracy Aruga, Safety Officer</u> Name and Title
	Department: Administration	Supersedes Policy:
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I. PURPOSE:

To define the function and responsibilities of the Contractor/subcontractor with regard to safety, health and environmental issues. This policy explains HMC’s requirements towards safety and health protection for Contractors to whom provides services for HMC.

II. SCOPE:

The Contractor Safety & Environmental Practices at Hilo Medical Center policy applies to all Contractors entering and/or providing services for HMC.

III. POLICY:

- Contractors/Subcontractors hired to supplement HMC’s existing workforce are subject to the same safety and environmental rules and regulations as HMC employees.
- Contractor/Subcontractors are to comply with all federal, state and county safety and environmental regulations.
- Contractor/Subcontractor is responsible for conducting continuous monitoring activities of their operations so they are fully aware of the probable sources of potential injury, illness or other unsafe acts or conditions.
- Failure to comply with this policy may result in the immediate removal of the Contractor’s/Subcontractor’s employee(s) from the HMC campus.

IV. BACKGROUND INFORMATION:

HMC frequently uses outside Contractors and /or subcontractors to perform work at its facilities. There are times when these Contractor(s) perform work, which can impact patients, HMC employees and properties, as well as the general public. During these times, HMC requires that certain safety and environmental compliant practices be followed in addition to the ones the Contractor is required by law or contractual obligation to follow. This policy outlines these minimum safety and environmental requirements and is intended for use by all Contractor company personnel who control or supervise Contractor/subcontractor’s workers. The policy is

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intended to supplement rather than replace applicable federal, state and county regulations.

V. RULES AND REGULATIONS:

Contractor shall comply with all applicable laws, ordinances, rules and regulations, including with limitation compliance with all regulations and training requirements applicable to safety, health and the environment. Contractor shall give required notices, shall procure and pay for all necessary municipal and governmental permits, unless provided by the company, licenses and inspections.

It shall be the responsibility of the Contractor, or their designed representative, to inform its employees and all of its subcontractors of all applicable safety and environmental rules and regulations and to enforce same.

HMC reserves the right to have removed from a site any contractor whose personnel do not comply with safety and environmental rules and regulations.

VI. FIRE SAFETY:

Besides complying with federal, state and local regulations, the Contractor is expected to follow the requirements stated in NFPA 241, Standard for Safeguarding Construction, Alteration, and Demolition Operations.

The standard prescribes the minimum safeguards for construction, alteration and demolition operations in order to provide reasonably safety to life and property from fire during such operations.

VII. PERSONAL PROTECTIVE EQUIPMENT – GENERAL REQUIREMENTS:

The Contractor is responsible for supplying personal protective equipment (PPE) to its employees and to ascertain that its personnel wear any protective equipment that is required by federal, state and county laws, and HMC rules and regulations. It is HMC’s policy that PPE **shall not** be loaned to contractor personnel.

The Contractor and its representatives are responsible for complying with all posted warning signs relating to PPE, on or at any of the HMC facilities.

VIII. INFECTION CONTROL:

During construction and renovation projects, the primary concern is often fire prevention, with secondary emphasis on general safety and exposure to chemicals. Often overlooked is the issue of infection control (IC). Construction procedures that can heighten infection risk in healthcare environments include demolition using inadequate barriers and exterior wall removal.

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Hilo Medical Center created a policy to protect the welfare of patients susceptible to these types of environments. The Contractor is expected to abide by the procedures contained in the HMC Construction and Renovation policy, #800-125-30. A copy of this policy will be provided to the contractor prior to the start of the project.

IX. HAZARDOUS WASTE MANAGEMENT:

The Contractor must provide a list of actual and potential hazardous waste(s) to be generated during a project to the Safety Officer. Hazardous waste generated by a Contractor as part of its work is the responsibility of the Contractor. Contractors must ensure that their hazardous waste is properly identified, stored, transported and disposed of in accordance with all applicable local, state and federal laws. Contractor employees must be trained to handle hazardous waste safely and in compliance with all applicable local, state and federal laws. For projects where temporary on-site storage is necessary, the Contractor must ensure at a minimum, proper labeling of containers and tanks, adequate secondary containment, segregation of incompatible materials and documentation of weekly inspections of these storage areas. Contractors must maintain an emergency plan and spill equipment to address, spills, fires, etc. In addition, all hazardous waste containers shall be constructed of a material that is compatible with the waste and kept securely closed at all times. The Contractor is responsible for completing all disposal documents, which may include but not limited to, waste profiles, waste analytical samples and hazardous waste manifests. Copies of these documents will be provided to the HMC Safety Officer at the end of the project for inclusion in HMC's project file.

In the event a Contractor encounters previously unidentified material that is reasonably believed to be radioactive, volatile, corrosive, flammable, explosive, biological, infectious, toxic, hazardous, asbestos containing, or oil based, the Contractor shall immediately stop work in the affected area and report the condition to the Safety Officer. At no time shall such material be disposed of in dumpsters, drains, pipes or any other waste container. The Contractor agrees to cooperate with the Safety Officer and consultants engaged by the hospital to perform services with respect to the analysis, detection, removal, containment, treatment, and disposal of such regulated material.

At no time shall hazardous materials be transported via private roads at Hilo Medical Center in a manner that could result in an unsafe condition for personnel or the environment. All transportation of hazardous materials while on HMC property shall be conducted in accordance with USDOT Hazardous Materials Regulations for proper packaging, marking/labeling, handling, documentation, etc. Contractors must ensure, in accordance with USDOT regulations, that proper shipping papers accompany shipments of hazardous materials and that a 24-hour emergency contact is available to address transportation related emergencies.

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X. HAZARDOUS MATERIALS:

It is the Contractor's responsibility to develop, implement and maintain their own Hazard Communication Plan that complies with 29 CFR 1910.1200. The Contractor shall submit an inventory of all hazardous chemicals that are brought on-site with accompanying Material Safety Data Sheets to the HMC Safety Officer. The Contractor shall also ensure that all containers that are brought on-site for storage of hazardous chemicals are labeled and inspected in accordance with all applicable regulations. The Contractor shall remove all hazardous chemicals that it brings on-site when work involving a specific hazardous chemical is complete.

The Contractor shall ensure its workers:

- Do not handle or use hazardous materials without training.
- Do not use solvents; paints, similar flammable, toxic, or irritating materials may be used in areas occupied by patients, visitors or employees unless specifically approved in writing by the Safety Officer.
- Maintain adequate ventilation when paints or solvents are used.
- Use flammable solvents and materials with extreme caution.
- Store flammable materials in approved flammable storage cabinets if inside buildings.

Based on the inventory of oil and hazardous chemicals that will be brought on-site, the Contractor shall have readily available equipment (e.g., absorbent pads and booms, secondary containment equipment) that is suitable and sufficient to control a potential spill/release. The Contractor is responsible for identifying conveyances to the environment (e.g., storm drains, floor drains) and adequately minimizing spill potential to these areas.

The Contractor is responsible for the proper storage of all flammable and combustible materials that are brought and/or stored on-site to complete the work of this contract. Such storage may require the use of safety containers, safety cabinets, and/or secondary containment. The Contractor shall ensure that any incompatible chemicals are safely segregated. The Contractor must use appropriate protective procedures such as double containments, inspections, employee training, overflow protection, and other measures as part of activities involving the use, storage, or handling of petroleum products or hazardous materials on Hilo Medical Center's campus.

The Contractor shall not use any insecticide products on the hospital's property unless such activities are part of your contracted work and you are specifically trained and licensed to do so. If a Contractor or his/her employees see evidence of cockroaches, mice, ants, or other pests during the course of their work, they must notify the Safety Officer immediately. Contractors must ensure that they perform on-site operations in a manner that optimizes the potential for pest infestation including, but not limited to,

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maintaining housekeeping on project site, utilizing rodent proof trash receptacles, and securing door/window/wall penetrations and other access points.

XI. BIOLOGICAL/CHEMICAL/RADIOLOGICAL HAZARDS:

Several Hilo Medical Center departments involve the use of biological, chemical or radioactive material that can be hazardous to HMC’s patients, visitors and staff if not handled properly. Areas where work with biological, chemical or radioactive materials is being performed will be marked or identified with appropriate signage. Do not enter these areas and do not handle these hazardous materials unless it is part of your contracted work and you are specifically trained to do so.

XII. ASBESTOS CONTAINING MATERIALS:

Hilo Medical Center will have determined, before work is begun, the presence, location and quantity of asbestos-containing or potentially asbestos containing materials (ACM) that would specifically impacted by the work of your contract. A specific audit report will be provided to you for these areas in question. The Contractor shall not disturb, damage or otherwise handle any suspect asbestos-containing materials unless such activities are part of your contracted work and you are specifically trained to do so. Asbestos abatement contractors shall coordinate with the Safety Officer and the HMC Maintenance department for specific requirements for asbestos abatement work. The Contractor must provide copies of all appropriate licenses/permits and certifications prior to commencing work.

If it is part of the Contractor’s work, stripping of floor finishes shall be done using low abrasion pads at speeds lower than 300 rpm and wet method shall be used. The Contractor shall take care not to over strip floors and shall stop stripping immediately upon removal of the old surface coat. Sanding of flooring material is strictly prohibited unless it is part of your contracted work and you are specifically trained to do so.

XIII. LOCKOUT/TAGOUT:

Hilo Medical Center protects its patients, visitors and employees in part by complying with 29 CFR 1910.147 – Control of Hazardous Energy Sources. As part of HMC’s Lockout/Tagout program, standard locks and tags are used to control the start-up of equipment that is being serviced or maintained by its employees. At no time shall the Contractor or its employees override any locks or tags that they encounter during the performance of its work.

The Contractor is responsible for developing, implementing and maintaining his/her own Lockout/Tagout program in accordance with OSHA regulations as it applies to the work of their contract. The Contactor will maintain a log of all machines and equipment that are locked out and/or tagged out during the performance of the work

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of this contract. This log shall identify the equipment that was worked on, the date that work was performed, and the name of the individual performing the work. The Contractor will submit this log to the Safety Officer upon request.

XIV. FALL PROTECTION:

Contractors are responsible for complying with 29 CFR 1926, Subpart M – Fall Protection, as it applies to their work on the hospital’s campus. Responsibilities include, but are not limited to:

- Provide Contractor employees with personal fall protection equipment or other hazard control measures listed within the fall protection standard and ensure their proper usage.
- Maintain guardrails, mid rails, and toe boards located in the hospital’s buildings or property unless removal is approved as part of the work.
- Cover all open holes, skylights, trenches, or excavations into which HMC’s patients, visitors or employees may fall and /or have guardrails installed around them.
- Ensure Contractor personnel are trained in accordance with the requirements listed in 29 CFR Subpart M.
- Ensure falling hazards are thoroughly communicated to Contractor employees and subcontractors.

XV. COMPRESSED GAS CYLINDERS:

Compressed gases can pose a sever hazard to HMC’s patients, visitors and employees, neighbors and property. Therefore, Contractors must take the following measures for the protection of others:

- Valve protection caps must be in place when compressed gas cylinders are transported, moved or stored.
- Close cylinder valves and replace valve covers when work is completed and when cylinders are empty or moved.
- Secure compressed gas cylinders in an upright position in a welding cart or to a solid object, securing chains or straps.
- Keep cylinders at a safe distance or shielding from welding or cutting operations. Do not place cylinders where they can contact an electrical circuit.
- Keep oxygen and flammable gas regulators in proper working order and a wrench in position on the acetylene valve when in use. If not manifolded together, separate oxygen and flammable gas cylinder by 20 feet.
- If a leak develops in a cylinder and it cannot be immediately corrected, move cylinder to a safe location outside the building.
- Use only approved spark igniters to light torches.

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XVI. WELDING, CUTTING AND BRAZING:

The Contractor will maintain its own Hot Work Permit system in accordance with OSHA 29 CFR 1910.252. In addition, the Contractor must take the following measures:

- Remove combustible materials from the area before beginning work.
- Elevate oxygen/acetylene hoses above the work area or otherwise protect them from damage.
- Install anti-flash back valves in both the oxygen/acetylene hoses at the regulator.
- Shield adjacent areas with welding partitions.
- Have a second person stand by with an approved fire extinguisher for welding and burning operations in accordance with OSHA regulations and permit requirements. This person shall remain in the area for a minimum of 30 minutes after the hot work is completed to ensure the site is cold.

XVII. CONTRACTOR ACCIDENTS:

The Contractor shall report any accident or near miss within 24 hours to the Safety Officer. Incidents that involves the patients, visitors or HMC employees, results in an injury, or affects the environment shall be reported. Incidents that did not cause injury or property damage, but easily could have are to be reported as well.

XVIII. REFERENCES:

- A. Code of Federal Regulations Title 29 – Labor 1900 to End.
- B. NFPA 241, 2000.
- C. Hilo Medical Center #800-125-30, 07/2005. Construction and Renovation.
- D. Compressed Gas Association, CGA P-1, 2000. Safe Handling of Compressed Gases In Containers.